

1 THE HONORABLE BARBARA J. ROTHSTEIN  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 JACOB ATKINSON, individually and on  
10 behalf of all others similarly situated,

11 Plaintiff,

12 v.

13 BURBERRY LIMITED, a foreign for profit  
14 corporation doing business as BURBERRY;  
and DOES 1 through 20,

15 Defendant.

Case No. 2:23-cv-01736-BJR

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO ANSWER  
OR RESPOND TO COMPLAINT AND  
DISCOVERY DEADLINES AND ORDER**

16 Plaintiff Jacob Atkinson and Defendant Burberry Limited (“Burberry”) respectfully, ask  
17 pursuant to Local Civil Rule 10(g), Local Civil Rule 7(d)(1), and this Court’s Standing Order, for  
18 the Court to extend the upcoming pleading and discovery deadlines by 30 days to enable the  
19 parties additional time to explore a potential resolution of this action. The parties are  
20 participating in discussions in an attempt to resolve this matter without engaging in unnecessary  
21 litigation. Most recently, the parties have exchanged drafts of CR 2A Agreement outlining a  
22 settlement structure that was discussed in several phone calls and email communications, and  
23 Burberry requires additional time to consider Plaintiff’s economic and non-economic terms,  
24 follow appropriate internal approval processes in order to propose a counteroffer, and further  
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1 engage Plaintiff in subsequent discussions about a potential resolution. Both parties thus stipulate  
2 as follows:

3       Burberry's time to answer or otherwise respond to Plaintiff's Complaint shall be  
4 extended by an additional 30 days from the current deadline of March 20, 2024 through and  
5 including April 19, 2024. To the extent Burberry files a dispositive motion in response to  
6 Plaintiff's Complaint, the parties agree to enter into a briefing schedule regarding same.  
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8       The deadline for the parties to participate in an initial conference pursuant to Federal  
9 Rule of Civil Procedure 26(f) shall be extended from March 22, 2024 through and including  
10 April 22, 2024.

11       The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of  
12 Civil Procedure 26(a)(1) shall be extended from March 29, 2024 through and including April 29,  
13 2024.

14       The deadline for the parties to submit a Joint Status Report shall be extended from April  
15 5, 2024 through and including May 6, 2024.

16       Accordingly, both parties respectfully request that the Court find good cause to enter an  
17 order extending the upcoming pleading and discovery deadlines as set forth in this Stipulation  
18 and the proposed Order below.

19       IT IS SO STIPULATED by and between the parties.  
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21       DATED: March 22, 2024  
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24       /s/Timothy W. Emery

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*Attorneys for Defendant Burberry Limited*

## ORDER

**PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

Defendant's time to answer or otherwise respond to Plaintiff's Complaint shall be extended through and including April 19, 2024.

The deadline for the parties to participate in an initial conference pursuant to Federal Rule of Civil Procedure 26(f) shall be extended through and including April 22, 2024.

The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) shall be extended through and including April 29, 2024.

The deadline for the parties to submit a Joint Status Report shall be extended through and including May 6, 2024.

DATED this 25th day of March 2024.

Barbara Rothstein

The Honorable Barbara J. Rothstein  
United States District Judge